



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

TWITTER, INC.,

Plaintiff,

v.

VOIP-PAL.COM, INC.,

Defendant.

Case No. 5:20-cv-02397-LHK

**JOINT STATEMENT REGARDING  
REVISED ~~[PROPOSED]~~ PROTECTIVE  
ORDER**

MODIFIED BY THE COURT

APPLE INC.,

Plaintiff,

v.

VOIP-PAL.COM, INC.,

Defendant.

Case No. 5:20-cv-02460-LHK

Re: Dkt. No. 56

AT&T CORP., AT&T SERVICES, INC.,  
AND AT&T MOBILITY LLC,

Plaintiffs,

v.

VOIP-PAL.COM, INC.,

Defendant.

Case No. 5:20-cv-02995-LHK

Re: Dkt. No. 56

CELLCO PARTNERSHIP d/b/a/ Verizon  
Wireless,

Plaintiff,

v.

VOIP-PAL.COM, INC.,

Defendant.

Case No. 5:20-cv-03092-LHK

Re: Dkt. No. 50

1 Plaintiffs Twitter, Inc., Apple Inc., AT&T Corp. et al., and Cellco Partnership d/b/a Verizon  
 2 Wireless and Defendant VoIP-Pal.com, Inc. (collectively, the “Parties”) submit this Joint Statement  
 3 Regarding a revised Proposed Protective Order.

4 The Parties submit a revised Proposed Protective Order, attached as Exhibit A.<sup>1</sup> The revised  
 5 Proposed Protective Order conforms with the Court’s October 30, 2020 order resolving the Parties’  
 6 disputes regarding the Protective Order and adopts the Court’s proposed language defining the scope  
 7 of the prosecution bar. *See* 5:20-cv-02397-LHK, D.I. 46; 5:20-cv-02460-LHK, D.I. 53; 5:20-cv-  
 8 02995-LHK, D.I. 53; 5:20-cv-03092-LHK, D.I. 47. The Parties respectfully request that the Court  
 9 adopt and order the revised Proposed Protective Order (Exhibit A).

10  
 11 DATED: November 13, 2020

12 By: /s/ Gene W. Lee  
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 28 <sup>1</sup> The Parties also provide a copy of the revised Proposed Protective Order that identifies the  
 changes made in response to the Court’s October 30, 2020 order, attached as Exhibit B.

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**ATTORNEY ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories to this document  
concur in its filing.

DATED: November 13, 2020 /s/ Ameet A. Modi